REMARKS

Applicant wishes to thank the Examiner for the attention accorded to the instant application, and respectfully requests reconsideration of the application.

Formal Matters

Claims 7-12 are pending in the application.

Rejection of Claims under 35 U.S.C. §102

Claims 7-12 are rejected under 35 U.S.C. §102 as being anticipated by Wilson et al., U.S. Patent Applicant Publication No. 2002/0133387 (hereinafter "Wilson"). This rejection should be withdrawn based on the comments and remarks herein.

Among the problems recognized and solved by Applicant's claimed invention is the need for a system and method capable of quick accommodation to business process reengineering and changes proposed by quality control activities. Applicant's solution includes creating sets of information and establishing not only a collection of generation sequences for these sets of information but also a process or flow for the collection of sequences. Thus, changes necessitated by business process redesign can be quickly performed. Using applicant's invention, it is possible to change an entire multi-step business process as well as an underlying business procedure by making a change in a master table.

The Examiner states that Wilson teaches entering "demand" information in 5W1H format (client id/who, client location/to whom, item/what, delivery date/when, customer's geographic region/where, shipping terms/how to deliver the demand), and the Examiner contends that Wilson discloses populating the "supply" information based on the demand information by disclosing a promise returned to the client by the promising engine.

Applicant respectfully disagrees. Wilson does not teach or suggest supply information in the same 5W1H format as the demand information. Instead, Wilson discloses that the request for an order has an identifier that will allow the promising engine to identify items without requiring that such information be retransmitted. Hence, the alleged supply information of Wilson is in the form of an identifier, and does not contain 5W1H information, so that Wilson does not disclose or suggest "said supply information being expressed as a combination of the 5W1H-format elemental information".

Further, the Examiner states that Wilson teaches creating multiple scenarios in which the demand information can be supplied to the user (see paragraph 50), and that Wilson identifies the most efficient process for getting the user the needed items and processes the order according to the best process (see paragraph 51), and that these features disclose a business procedure, a business flow, a business procedure master and a business flow master as claimed in the present invention. Applicant respectfully disagrees. In paragraph 50, Wilson discloses determining if the closest warehouse can fulfill a customer's requirements. In paragraph 51, Wilson discloses a procedure used when the closest warehouse cannot fulfill the customer's requirements. Taking these two paragraphs together, Wilson discloses a method for fulfilling one order, either by shipping from the closest warehouse or from another warehouse or rejecting the order. Wilson does not disclose or suggest fulfilling more than one requirement or request, i.e., more than "one demand", so that Wilson does not disclose or suggest either a business procedure comprising a plurality of sets of information (comprising demand information and supply information) or "a business process based on a generation sequence of a plurality of sets of said demand information and said supply information" as recited in claims 9-12.

Moreover, the Examiner states that Wilson teaches the client/customer submitting information regarding shipping terms and their geographic location, and when client/customer's geographic location and shipping terms are different, the supply-promise to deliver the order will change based on the ability of the warehouses to meet the demands of the location and shipping terms of the client/customer. Applicant respectfully disagrees that Wilson's changing the supply-promise to deliver reads on executing a business process based <u>a generation sequence of a plurality of sets</u> of said demand information and said supply information. As discussed above, Wilson only discloses a single ordering procedure in which a customer places an order and it is either filled or not. Wilson does not disclose or suggest a generation sequence of a <u>plurality of sets</u> of demand information and supply information. Consequently, Wilson does not disclose or suggest each feature recited in the independent claims of the application.

It has been held by the courts that "Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim." *Lindemann Maschinenfabrik GMBH v. American Hoist and Derrick Company et al.,* 730 F.2d 1452, 221 USPQ 481 (Fed. Cir. 1984). As illustrated above, Wilson does not disclose or suggest supply information in 5W1H format, or a business procedure comprising a plurality of sets of demand/supply information, or a business process based on a generation sequence of a plurality of sets of demand/supply information, and Wilson does not disclose or suggest each and every feature of the invention as recited in independent claims 7 and 9-12. Thus, these independent claims are patentable over the art of record in the application. Claim 8 depends from claim 7, incorporating all of the features and limitations of its base claim. Thus, claim 8 is patentable over the art of record in the application for at least the reasons that its base claim is

patentable over the art of record in the application. Therefore, withdrawal of this rejection is kindly requested.

Conclusion

For at least the reasons set forth in the foregoing discussion, Applicant believes that the Application is now allowable, and respectfully requests that the Examiner reconsider the rejections and allow the Application. Should the Examiner have any questions regarding this Amendment, or regarding the Application generally, she is invited to telephone the undersigned attorney.

Respectfully submitted,

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